

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
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This document relates to:

Furman v. Islamic Republic of Iran (plaintiff in Johnson et al. v. Islamic Republic of Iran, 18-cv-12344 (GBD)(SN))

ATTORNEY DECLARATION

Austin Estelle, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing Plaintiff Naomi Furman (whose case is associated with the *Johnson* plaintiffs) in the above-captioned litigation and I submit this declaration in support of the motion for default judgment and for permission to allow any remaining *Johnson* plaintiffs to move for the same relief in separate stages.

2. The source of my information and the basis for my belief in my statements is my personal involvement in this matter; my firm's involvement in other litigation involving 28 U.S.C. § 1605A for the past 15 years; my firm's representation of Ms. Furman in connection with the September 11th litigation; communications directly with Ms. Furman and other family members of individuals killed in the attacks on September 11th; official records provided by claimant; and other court records relating to the multi-district litigation to which Ms. Furman is a party. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. I have been retained individually by Ms. Furman, and the other *Johnson* plaintiffs, to pursue recovery for their solatium losses arising out of the deaths of their loved ones on September 11, 2001. My office has verified that Ms. Furman has not recovered solatium

damages previously, nor does she have any other pending motion before this Court for compensation arising out of the September 11th attacks.

4. Ms. Furman is a citizen of the United States and is the daughter of Steven Furman, an individual who died in the September 11th Attacks. Ms. Furman's relationship to Steven Furman has been personally verified by attorneys and paralegals in my office and the office of our co-counsel the Rothenberg Law Firm, LLP that have obtained written documentation and/or conducted interviews confirming the nature of her relationship to Steven Furman.

5. As the daughter of Steven Furman, Ms. Furman satisfies the framework established by this Court and sufficiently shows that she is eligible for solatium damages.

6. To minimize the chance of any human error in submitting the instant motion, my firm has instituted a quality control process, during which an additional attorney and a paralegal review all case files and corroborate that the relationship as stated in this Declaration and that the claimants all survived the deaths of their loved ones on September 11, 2001.

7. Accordingly, I respectfully request that this Court grant the proposed default judgment.

Respectfully,

/s/ Austin Estelle
Austin Estelle, Esq.
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Exhibit A

<u>Name</u>	<u>State</u>	<u>Country</u>	<u>Relationship</u>	<u>Award</u>
Naomi Furman	MD	USA	Child	\$8,500,000